

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MELINDA SGARIGLIA,)	
)	
Plaintiff,)	Case No. 1:19-cv-05684
v.)	
)	Honorable Robert M. Dow, Jr.
AMERICAN INTERNATIONAL)	
RELOCATION SERVICES, LLC, d/b/a)	Magistrate Judge Young B. Kim
AIRES, an Illinois limited liability)	
company, NICHOLAS GONRING, and)	
KELSEY GONRING,)	
)	
Defendants.)	
)	
<hr style="width: 40%; margin-left: 0;"/>)	
NICHOLAS GONRING and KELSEY)	
GONRING,)	
)	
Third Party Plaintiffs,)	
)	
v.)	
)	
2726 WEST CORTEZ CONDOMINIUM)	
and JOHN GORR,)	
)	
Third Party Defendants.)	

**NICHOLAS GONRING AND KELSEY GONRING’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE AND CROSS-MOTION TO
PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

Defendants/Third Party Plaintiffs Nicholas and Kelsey Gonring (collectively the “Gonrings”), by their attorneys Jordan A. Finfer and Elizabeth L. Archerd of the law firm of Patzik, Frank & Samotny Ltd., respectfully request that this Court grant them an additional seven (7) days pursuant to FRCP 6(b) to respond to Plaintiff’s Motion for Partial Summary Judgment and file any cross- motion, and in support thereof, state as follows:

1. This matter stems from Plaintiff, Melinda Sgariglia’s (“Sgariglia”) Second Amended Complaint against the Gonrings in which she asserts causes of action against the

Gonrings for breach of the Illinois Residential Real Property Disclosure Act and fraudulent concealment. See the Second Amended Complaint, Dkt. 45.

2. On April 4, 2023, this Court set a briefing schedule for filing cross-motions for summary judgment. As relevant to this motion, Plaintiff was to file her motion for summary judgment by May 31, 2023, and Defendants were to file responses and cross-motions for summary judgment by June 30, 2023. Dkt. No. 201.

3. On May 31, 2023, Plaintiff filed an unopposed motion for extension of time, seeking an additional 21 days to file her motion for summary judgment. Dkt. No. 202.

4. On May 31, 2023, the Court granted Plaintiff's motion for extension of time, and re-set the above deadlines as follows: Plaintiff's motion for summary judgment due June 21, 2023, and Defendants' responses and cross-motions for summary judgment due July 21, 2023.

5. The undersigned was out of the office for her wedding and honeymoon beginning June 29, 2023, returning July 17, 2023.

6. While the Gonrings have endeavored to finish their briefs in the allotted time, they require additional time to complete these materials.

7. FRCP 6(b) provides, in part, "When an act may or must be done within a specified time, the court may, for good cause, extend the time: (a) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires..." FRCP 6(b).

8. As the deadline for responding to Plaintiff's Motion for Partial Summary Judgment and filing any cross-motion has not passed, the Gonrings request this Court pursuant to FRCP 6(b) to grant seven (7) days additional time for them to file these materials.

9. This request is not made for purposes of delay and Plaintiff will not be prejudiced by this extension.

10. Counsel for the Plaintiff, counsel for Defendant AIRES, and counsel for the Third-Party Defendants 2726 West Cortez Condominium and John Gorr, have indicated that they have no objection to this motion. In addition, counsel for Defendant AIRES and counsel for the Third-Party Defendants request that they also be granted a one-week extension to file their response to Plaintiff's Motion for Partial Summary Judgment and any cross motions. Accordingly, the Gonrings request that the briefing schedules be re-set as follows:

- a. Defendants to respond to Plaintiff's Motion for Partial Summary Judgment and file any cross-motion on or before July 28, 2023;
- b. Plaintiff's reply in support of her Motion for Partial Summary Judgment and response to any cross-motion filed by Defendants due by August 18, 2023; and
- c. Defendants' replies due September 7, 2023.

WHEREFORE, Defendants Nicholas and Kelsey Gonring respectfully request that this Honorable Court enter an order: (1) granting this motion; (2) granting the Gonrings an additional seven (7) days to July 28, 2023 to respond to Plaintiff's Motion for Partial Summary Judgment and file any cross-motion and re-setting the briefing schedule accordingly; and (3) for such other and further relief as this Court deems equitable and just.

Dated: July 20, 2023

**NICHOLAS GONRING and
KELSEY GONRING**

By: /s/ Elizabeth L. Archerd
One of their attorneys

Jordan A. Finfer (ARDC #6296373)
Elizabeth Archerd (ARDC #6329394)
Patzik, Frank & Samotny Ltd.
200 S. Wacker Drive, Suite 2700
Chicago, IL 60606
Phone: 312-551-8300
jfinfer@pfs-law.com
earcherd@pfs-law.com